

Enclosure C:**EPA Comments on Proposed Chevron Permit****COMBUSTION UNITS****Applicable Requirements*****Furnaces and Heaters***

The daily throughput limit specified for S-4044 in Table II A 2 on page 40 is greater than the limit allowed by Condition #16686 on page 368. Please revise the limit on page 40 so that it is consistent with the current limit.

102

COOLING TOWERS**Applicable Requirements**

1. Condition 10160 (p374) of the draft permit lists three additional cooling towers (sources 4018, 4179, and 4074) that are not subject to the applicable requirements on page 138. These units should be added to page 138 unless the District can clarify why these units are not subject to the requirements. These units were also omitted from the section on applicable limits and monitoring requirements (see page 426).

03

2. Source 4329 appears in the cooling tower calculations; however it does not appear in the statement of basis or draft permit. Unless the District can explain why this source is not subject to the requirements of the other cooling towers, it should be added to the relevant tables in the draft permit.

104

Monitoring

1. A total of 14 cooling towers are identified in the draft permit; however emissions calculations are provided for only three units. The District can not exempt units from monitoring requirements if no data and calculations are available for them. This is especially true for units S-6051, S-6054, and S-6055; these units have additional source-specific emissions limits that are more stringent than those in Rule 8-2-301, which provide the basis for the exemption. Before exempting all of the cooling towers from particulate and POC monitoring requirements, the District should add calculations for the following units to Appendix G: 4018, 4073, 4074, 4076, 4078, 4172, 4179, 4187, 6051, 6054, and 6055. Additional calculations are also required to demonstrate compliance with Part 1 of Condition #14596, Part 1 of Condition #10597, and Part 1 of Condition #10598 for units 6051, 6054, and 6055 respectively.
2. The calculations provided in Appendix G show that the PM emissions from all of the refineries are well below the 0.15 gr/dscf limit of rule 6-310. As a result, the District says that monitoring of the cooling tower emissions for particulates is not required. Despite this finding, monitoring requirements are included in the permit (see page 426) and statement of basis (page 24).
3. According to Table II A of the permit, the daily throughput limits for units 4076, 4172,

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4173, 4191, and 4329 are under investigation. At the same time, the calculations in Appendix G have specific values for three of these units. If the throughput limits for units 4173, 4191, and 4329 are still under investigation, these calculations should be removed from the appendix and the units should be subject to monitoring requirements for PM and POC. If the throughput limits are no longer under investigation, the appropriate limits should be inserted into the permit and the emissions calculations should be updated.

107

EMISSION CAPS

We understand the BAAQMD has determined that caps have created implementation problems. In order to assure compliance with the cap emission limits, we recommend that the District make any necessary revisions in addition to those noted below.

Applicable Requirements

1. We appreciate the District's commitment to replace ambiguous language regarding fugitives from "existing process units" and instead clearly state which fugitives are included and which are excluded. Also, the permit must clarify whether the limits are adjusted for new fugitive sources, p302, condition H.

108

2. We appreciate the District's commitment to clarify that the "equivalent reductions" authorized on p300, condition 9E, must also meet the District's SIP-approved NSR rule to qualify as offsets.

109

3. Please delete conditions for burning fuel oil (for example p307), as they conflict with the prohibition on p297, condition 6(A).

110

4. We appreciate the District's commitment to clarify that emission caps may be used as an offset baseline (p301, condition G) only if allowed under the approved SIP rule; and to delete the variance provision or clearly state that it does not affect federal enforcement (p302, K).

111

Monitoring

1. Please specify which units will use CEMs data on p295-296 and indicate how emissions will be determined for other units (some of which could use emission factors on pp 320-327 that could differ based on whether they are "new" or "existing" sources).

112

2. We recommend clarifying the source testing requirements that will be used to verify compliance with the cap. For instance, we understand that the District, CARB, and South Coast test data indicate that wharf emission factors are understated, including

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uncontrolled loading of "low pressure" materials (CBE p.42 9/22/03).

Miscellaneous

1. We appreciate the District's commitment to state the effective date of the cap or remove unclear language regarding this date on p302.] 114

FLARES

Applicable Requirements

We understand the District agrees with us that it is inappropriate to exempt flares from Regulation 8-2 based on a determination that they are exempt from Regulation 8-1. Regulation 8-1, which regulates the storage and disposal of rags, open containers, and the clean-up of spray equipment, is not an appropriate reason for an exemption. Please remove citations to Regulation 8-1-110.3 exempting flares from Regulation 8-2.] 115

Federal Enforceability

On pages 106 (Table IV.A.2.1) and 397 (Table VII.A.2.1), parts 1 and 2 of condition 18656 are listed as not federally enforceable. This condition is based on Part 70 rule 2-6-409.2 (page 388-389) and should be marked federally enforceable.] 116

Miscellaneous

1. Please move gas turbine requirements from Table IV.A.1.1, source-specific applicable requirements for flares (page 102-104), to the gas turbine section of the permit.] 117
2. Please clarify whether S-6004, "incinerator sulfur oxidizer" is in operation. It is mentioned on page 341, but nowhere else.] 118

FLUID CATALYTIC CRACKING UNIT

Applicable Requirements

NSPS requirements 60.104(b)(3), 60.104(c), 60.105(e)(2), 60.106, 60.106(b)(3), and 60.107 must be included in the permit for S-4285.] 119

PERMIT SHIELD

Applicable Requirements

The following federal regulations are inappropriately subsumed by BAAQMD Regulations (p490-491):

1. 60.482-7(g): While BAAQMD rule 8-18 does not specifically allow for relief from monitoring unsafe-to-monitor equipment, it appears that unsafe-to-monitor equipment could be covered by rule 8-18-306 - Non-repairable Equipment. This rule requires that any valve etc which cannot be repaired as required by 8-18-302, 303, or 305 must be repaired or replaced within 5 years or at the next scheduled turnaround,

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whichever comes first. As there is no definition of "non-repairable equipment" in this rule, unsafe-to-monitor equipment could be covered. The federal rule requires a demonstration of immediate danger and monitoring as frequently as practicable during safe-to-monitor times. It appears that neither rule subsumes the other. Please add 60.482-7(g) to Tables IV and VII.

Comment

120

2. 61.242-7(g): Please see 1 above. Please add 61.242-7(g) to table IV, and to table VII with appropriate monitoring.

121

Miscellaneous

Table IX-A-2 (p490) is mislabeled as a permit shield for non-applicable requirements. Please change to permit shield for subsumed requirements.

122

STORAGE TANKS

Applicable Requirements

1. For sources subject to NSPS Subpart Kb, the frequency specified for inspections of the secondary rim seal is not consistent with the regulations. The permits require inspections for holes or tears of the secondary rim seal at a frequency of once every ten years; however, pursuant to 60.113b(a)(2), the secondary seal should be inspected for holes, tears, or detachment on an annual basis.

123

2. Several sources are subject to the requirements of Condition #20773; however the District neglected to include the condition in the permit. All relevant parts of this condition should be incorporated into Section VI.

124

3. The permit contains a discrepancy in the requirements that apply to Cluster 02. Page 160-162 lists numerous applicable requirements from rule 8-5; however Table VII.F.1.3 claims an exemption from these requirements on page 446. The information in the permit and statement of basis is not sufficient for EPA to determine the applicability of the rule. The District should review the applicability and make the appropriate corrections to the permit.

125

Federal Enforceability

It is unclear why conditions 4233, 12580, and 18137 are not federally enforceable in the permit. Permit conditions originating from SIP-approved permits (such as those issued pursuant to NSR or PSD permit programs) should be identified as federally enforceable.

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Monitoring

1. The frequency specified for many tank monitoring requirements in all of the permits is "not specified." In cases where the monitoring frequencies are not specified in the applicable requirements, the District should establish appropriate ones. } 127
2. For the internal floating roof tanks in Cluster 12, the District mistakenly cited the monitoring requirements in Section 8-5-401. The requirements of Section 401 should be changed to those of 402. } 128
3. The inspection requirements for pressure vacuum valves specified in Section 8-5-403 were omitted from the monitoring requirements for numerous tank clusters. This monitoring requirement should be added to the list of requirements for all tanks subject to Section 8-5-303. } 129

SULFUR TREATMENT EMISSIONS

Federal Enforceability

Sulfur Recovery Unit

The requirements for 9-1-313, 9-1-313.2, 1-522 and 1-522.7 for units S-4227, S-4228, and S-4229 should be federally enforceable because the rule citations are in the SIP. } 130

VOC COMPONENT FUGITIVES (SUCH AS COMPRESSORS, FLANGES, PUMPS, VALVES)

Applicable Requirements

Fugitive Sources (Table IV.H.2.1, p275-278 and Table VII.H.2.1, p477-481)

CFR 40 Part 60, Subpart A and CFR 40 Part 63, Subpart A

Please include 40 CFR part 60, subpart A and 40 CFR part 63, subpart A in the applicable requirements table (IV.H.2.1) and as needed in the applicable limits and compliance monitoring table (VII.H.2.1). } 131

CFR 40 Part 61, Subpart FF

Please add more of the requirements from 40 CFR 61.349 (from subpart FF) to tables IV and VII. } 132

CFR 40 Part 60, Subpart QQQ

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Please include more detail for requirements for 40 CFR 60 QQQ on Table IV, and add limits and monitoring to Table VII, as needed. } 133

CFR 40 Part 60, Subpart VV and Part 61, Subpart V

Please make the following changes:

1. 60.482-9(d): Add italicized phrase - "pumps under 'delay of repair' repaired *as soon as practicable, but within 6 months.*" } 134
2. 60.482-4(a): Change wording to "Pressure relief valve (gas/vapor) <500 ppm above background," since that is the limit. } 135
3. 60.482-7(b) and 61.242-7(b): This limit covers 60.482-7(b) and (c) and 61.242-7(b) and (c). Please fix the citation. } 136
4. 60.482-10 (c) and 61.242-11(c): Please specify which limit the refinery will be using. We recommend a 0.75 second residence time, with the temperature maintained at 816 °C. } 137
5. 60.482-10(g) and 61.242-11(f): Change to, "First attempt to repair leak (visible or >= 500 ppm) within 5 days, repair complete within 15 days, except as allowed for in 60.482-10(h)." } 138
6. 60.482-4(b) and 6.242-4(b): Change wording to, "Pressure relief valve (gas/vapor) 500 ppm within 5 days after a pressure release event." } 139
7. 60.482-8(a) and 61.242-8(a): Change wording to, "...if detected by inspection, or if a leak is seen, heard, or smelled." } 140
8. 61.242-2(g): The limit cited is for 61.242-2(h). If the district meant (h) please change limit to reflect this. If the district meant (g) change limit to "If unsafe to monitor, monitor as frequently as practicable." } 141
9. 61.242-3 and 60.482-3: If practical, please specify whether the refinery will be using a sensor with an audible alarm or if the refinery will be checking daily. If using a sensor please add a requirement for sensors to all equipment subject to this regulation. } 42

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10. 61.242-4: Change wording to "Pressure relief valve (gas/vapor) <500 ppm above background," since that is the limit.

} 143

Gasoline Dispensing Facilities

1. The statement of basis and permit do not contain sufficient information to determine whether or not source 9304 classifies as a Group 2 gasoline loading rack under Subpart CC of 40 CFR Part 63 and whether it is therefore subject to the requirements of the subpart. We appreciate the District's commitment to review the applicability of 40 CFR 63.650 with respect to this source and, if appropriate, include the applicable requirements in the permit.

} 144

2. The requirements of 40 CFR 63 subpart Y were omitted from the permit for sources 4315, 9321, 9322, 9323, 9324, 9325, and 9326 and no justification for the omission was provided in the permit or the statement of basis. According to 63.651(a), "the owner or operator of a marine tank vessel loading operation located at a petroleum refinery shall comply with the requirements of 63.560 through 63.567." We appreciate the District's commitment to revise the permit to include the necessary applicable requirements or provide documentation in the statement of basis.

} 145

3. Section 8-44-305 was omitted from the list of applicable requirements for the loading terminals in Table IV.B.5.1 on page 136-137. The District should update this table accordingly.

} 146

Federal Enforceability

Fugitive Sources

Please explain the discrepancy between the enforceability determination for condition 8869 on pages 394 and 284, and please change the permit appropriately.

} 47

Monitoring

Fugitive Sources (Table VII.H.2.1, p477-481)

BAAQMD Regulation 8-18

Please add appropriate monitoring for 8-18-306.1, 8-18-306.2, 8-18-306.3, and 8-18-307 to Table VII.

} 148

BAAQMD Regulation 8-28

Please add limits and monitoring for 8-28-301 to Table VII. We suggest adding limits and monitoring for non-SIP rules from 8-28.

} 149

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CFR 40 Part 60, Subpart QQQ

1. 60.692-5(g): The monitoring included is inappropriate for this limit. Please add continuous temperature monitors and gas flow meters. The residence time and temperature requirements of this limit need to be included in the permit for all applicable units. } 150
2. 60.692-5(b): No monitoring is included for 95% efficiency. Please include a monitoring method to determine compliance with this regulation. } 151

CFR 40 Part 60, Subpart A and CFR 40 Part 63, Subpart A

Please include 40 CFR part 60, subpart A and 40 CFR part 63, subpart A in the applicable limits and compliance monitoring table (VII.H.2.1). } 152

CFR 40 Part 61, Subpart FF

Please add more of the requirements from 40 CFR 61.349 (from subpart FF) to Table IV and Table VII. } 153

CFR 40 Part 60, Subpart QQQ

Please add limits and monitoring for 40 CFR part 60, subpart QQQ to Table VII. } 154

CFR 40 Part 60, Subpart VV and Part 61, Subpart V

Please make the following changes:

1. 60.482-9(d): Add P/E record-keeping and reporting. } 155
2. 60.482-4(a): Add "measure for leaks" (Periodic) to monitoring column. } 156
3. 60.482-7(b) and 61.242-7(b): Add a record-keeping requirement. } 157
4. 60.482-10 (b) and 61.242-11(b): Include a monitoring method to determine compliance with the 95% control efficiency requirement. } 158
5. 60.482-10 (c) and 61.242-11(c): If the limit used is 95% efficiency, please see the comment above. If the limit used is residence time and temperature, please add continuous gas flow meters and temperature monitor. Please also add these requirements to all equipment subject to this rule. } 159

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6. 60.482-10(g) and 61.242-11(f): Add record-keeping. } 160
7. 60.482-4(b) and 61.242-4(b): Add record-keeping. } 161
8. 60.482-8(a) and 61.242-8(a): Add record-keeping. 7
9. 60.483 and 61.243: Add to monitoring "Notify Administrator of election to comply with 60.483 or 61.243," and record-keeping of percent of valves found leaking during each leak detection period. } 163
10. 61.242-2(g): The limit given is for 61.242-2(h). If the district meant (h) please change monitoring citation to reflect this. If the district meant (g) change monitoring type to measure leaks; visible, auditory, and olfactory inspection; and record-keeping and reporting. } 164
11. 61.242-10(d): Add record-keeping requirement.
12. 61.242-3 and 60.482-3: Please add record-keeping for both regulations. If using a sensor please add a requirement for a sensor to all equipment subject to this regulation. } 166
13. 61.242-4: Add "measure for leaks" (Periodic) to monitoring column. } 167

Miscellaneous

Process Vessel Depressurization, FCCU and H₂ Catalysis

We were unable to review this section of the permit due to time constraints. However, as stated in our general comments, please make all revisions noted in our comments for other facilities that also apply to the Chevron permit. } 168

Fugitive Sources

On page 481, one of the limits says "To be determined upon permit condition revisions" Please clarify. } 169

WASTEWATER AND PROCESS DRAINS

We were unable to review this section of the permit due to time constraints. However, as noted in our general comments, please make all revisions noted in our comments for other facilities } 170

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that are also apply to this permit.

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COGENERATORS

Monitoring

1. Please clarify in the permit that the District assumes 100% conversion of H₂S to SO_x emissions (p144; Table IV A22.1 condition 19177) when determining compliance with the SO_x limits in the permit. } 71
2. We recommend requiring that Valero test for PM10 and sulfur compounds at maximum H₂S content (p160; Table IV A22.2 condition 19177). } 172

COMBUSTION UNITS

Applicable Requirements

Boilers

Please add the numeric limits of the NSPS for boiler S-237 (p. 124 Table IV-A20). For example, for citations to 60.104(a) please include the concentration (ppm) limit. } 173

Furnaces and Heaters

1. The permit contains a federally-enforceable restriction on the heat input for a number of units (p.473); however the restrictions are marked not federally enforceable in several places (for instance p.68, p.69, p.79, etc). Please change the designations to federally enforceable. } 74
2. The numeric limits and compliance periods for S-3 and S-4 were crossed-off and replaced; please explain the basis for this change. } 175
3. S-42: The permit contains citations to possible exemptions from Reg 9-10 (p109), but does not contain the rule limits nor does it require that the facility meet the emission limits. Please add conditions requiring the source to meet the conditions of the exemption, unless the District 1) requires that the unit meet these emission limits or 2) adds an alternative operating scenario. } 176

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COOLING TOWERS

Applicable Requirements

BAAQMD rules 6-301, 6-305, 6-310, and 6-311 were omitted from the table of source-specific applicable requirements for source 29 (Table IV-D1 p182). All of the applicable limits for source 29 and an indication that monitoring is not required should be listed in Table VII-D. These include, but are not limited to, regulations 6-301, 6-305, 6-310, 6-311, and 8-2-301. } 177

Monitoring

Please see our earlier comment (Tesoro Cooling Towers, Monitoring, Comment 1) regarding monitoring the HAP content of these units } 178

ELECTROSTATIC PRECIPITATORS

Monitoring

As discussed in our comments for the Tesoro permit, the District must require periodic monitoring for the ESPs controlling units S-5 and S-6 (the facility appears to have a main stack that is common to units 3,4,5,6,10,13,50 in table II-C). } 179

FCCU

Applicable Requirements

The permit contains a nonapplicability permit shield (Table IX A-2) from 40 CFR Part 60 Subpart J, stating that the Claus sulfur plant has not been modified after October 4, 1976. However, the permit is unclear whether Subpart J applies to the FCCU. The SO_x, PM, and opacity standards under Subpart J must be included in the permit for S-5 if these standards apply. } 180

Monitoring

1. Requirements for 1-522.1, 1-522.7, 1-602, and 1-604, under Table IV - A4 for S-5 (fluid catalytic cracking unit and catalyst regenerator), should be federally enforceable because these rules are in the District's SIP. } 181
2. The permit should contain requirements for 6-305 and 6-401 of the District's SIP. } 182

FLARES

Applicable Requirements

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The other four Bay Area refinery permits have incorporated the District's new flare monitoring rule (Rule 12-11), while the Valero permit excludes this rule. We suggest that all five permits include Rule 12-11. } 183

- 2 The Statement of Basis cites Regulation 6-310 as an applicable requirement for sources 16-19 (page 22). We were not able to find this citation for these flares in the permit. If Regulation 6-310 is missing from the permit, please add it to tables IV and VII of the permit. } 84

Monitoring

As noted in our earlier comments on the Valero asphalt plant, please remove the temperature excursion language (p444, section VI, condition 11882) that allows a temperature deviation of any amount for up to fifteen minutes. We understand that the District is concerned about monitor malfunctions. We recommend deleting this excursion language and instead including provisions for the source to note periods of monitor malfunction. We understand that this unit is an enclosed oxidizer and not an open-air flare. } 185

STORAGE TANKS

Applicable Requirements

1. For sources subject to NSPS Subpart Kb, the frequency specified for inspections of the secondary rim seal is not consistent with the regulations. The permits require inspections for holes or tears of the secondary rim seal at a frequency of once every ten years. However, pursuant to 60.113b(a)(2), the secondary seal should be inspected for holes, tears, or detachment on an annual basis. } 186
- 2 Several sources are subject to the requirements of Condition #20773. However the District neglected to include this condition in the permit. All relevant parts of this condition should be incorporated into Section VI. } 87
- 3 The permit contains a discrepancy in the requirements that apply to Cluster 02. Page 161 lists numerous applicable requirements from rule 8-5. However, Table VII.F.1.3 claims an exemption from these requirements on page 446. The information in the permit and statement of basis is not sufficient for EPA to determine the applicability of the rule. The District should review the applicability and make the appropriate corrections to the permit. } 189

Federal Enforceability

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It is unclear why conditions 4233, 12580, and 18137 are not federally enforceable in the permit. Permit conditions originating from SIP-approved permits (such as those issued pursuant to NSR or PSD permit programs) should be identified as federally enforceable. } 189

Monitoring

1. The frequency specified for many tank monitoring requirements in all of the permits is "not specified." In cases where the monitoring frequencies are not specified in the applicable requirements, the District should establish appropriate ones. } 190
2. For the internal floating roof tanks in Cluster 12, the District mistakenly cited the monitoring requirements in Section 8-5-401. The requirements of Section 401 should be changed to those of 402. } 191
3. The inspection requirements for pressure vacuum valves specified in Section 8-5-403 were omitted from the monitoring requirements for numerous tank clusters. This monitoring requirement should be added to the list of requirements for all tanks subject to Section 8-5-303. } 192

SULFUR RECOVERY UNIT

Federal Enforceability

1. The requirements under 9-1-301, -305 and -502 of the District's SIP, if applicable, must be included in the permit for S1 and S2. } 193
2. The requirements for Rule 9-1-313.2 (see requirements for units S1 and S2) should be federally enforceable because it is in the SIP. } 194
3. Please clarify whether rules 9-1-606 and -607 apply to S1 and S2 in order to meet Rule 9-1-313. } 195

Monitoring

The District has proposed deletion of the H₂S monitor installation requirement (Page 422, condition 125, in part V). Instead, please require operation & maintenance of the H₂S monitor. } 196

THROUGHPUT LIMITS ON GRANDFATHERED UNITS

The permit appears to be missing the general discussion that is included for other permits to

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avoid any misunderstanding that these limits could be relied upon to avoid NSR applicability. Please add this language to the permit to clarify that these limits trigger reporting requirements and cannot be relied upon to presume that a unit is, or is not, subject to NSR.

} 197

VOC FUGITIVES

We were unable to review this section of the permit due to time constraints. However, as noted in our general comments, please make all revisions noted in our comments for other facilities that also apply to the Valero permit. Also, please note that the Statement of Basis states that no monitoring is required for several VOC fugitives requirements (pp24-6) because the units have a control device. Control devices on vent emissions will not assure compliance with limits for fugitive emissions. Please demonstrate the VOC fugitive emissions monitoring is already required or add this monitoring to the permit.

} 198

WASTEWATER TREATMENT AND PROCESS DRAINS

Applicable Requirements

1. Table VII - Refinery (p511):

a. The reporting requirements of 61.357(d)(2), (5), and (7) are listed. Please add 61.357(d)(6) and (8) to these requirements or document why they do not apply. In addition, the permit should indicate that these reports should be submitted to the Administrator.

} 199

b. The monitoring requirement of 61.357(d)(5) applies if the owner/operator elects to comply with 61.342(e). If 61.342(e) is the chosen option, then the applicant should demonstrate that the flow-weighted annual average water content of facility waste is $\geq 10\%$, as described in 61.342(e)(2).

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c. Further, facility waste with less than 10% water content would be subject to 61.342(c)(1). The permit should include these requirements.

} 201

Table VII - H2.1, Wastewater, and H2.2, Biotreaters: 61.354(b)(2) is listed as the monitoring requirement citation. Please provide the following information:

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a. Does the owner comply with all the requirements of 61.348(b)?

b. Are these exempt waste management units, and if so, what is the basis for the exemption? - Are these enhanced biodegradation units?

} 203

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3. Please explain why S-161 (Sewer Pipeline) is not subject to 40 CFR 61 Subpart FF and 40 CFR 63 Subpart CC, and if portions of the pipeline are part of "individual drain systems." } 204
4. For all CPS units (oil-water separators), a permit condition should be added to Section VI to state the requirement of 61.347(a)(1)(i)(B), that each opening shall be maintained in a closed, sealed position at all times that waste is in the oil-water separator. } 205
5. Please verify that the record-keeping requirements of 61.356 are included in the permit. } 206
6. Please explain why there are no permit conditions or monitoring requirements for the wastewater thickener (S-192), and if it is subject to 40 CFR 61 Subpart FF or 40 CFR 63 Subpart CC. } 207
7. There are monitoring requirements in Table VII - H2.1 and H2.2, but there are no permit conditions for the biotreaters: S-154, S-155, S-169, S-214, S-215, and S-238. Please explain if these are subject to 40 CFR 61 Subpart FF or 40 CFR 63 Subpart CC. } 208
8. Please explain why there are no permit conditions or monitoring requirements for refinery process drains (S-32105), and if they are part of "individual drain systems," which would be subject to 40 CFR 61 Subpart FF. } 209
9. If the facility has slop oil vessels please determine if rules 8-8-305, 8-8-305.1, 8-8-305.2 and NSPS subpart QQQ 60.692(d)-(e) apply. } 210
10. If sludge dewatering occurs please determine if Rule 8-8-304 applies. } 211

Monitoring

1. Table VII - H4.1 and H5.1: For S-188 and S-189, the monitoring requirement of 61.354(f)(1) is to ensure compliance with 61.349(a)(1)(ii)(B). The requirement of a flow indicator contained in 61.349(a)(1)(ii)(A) is not required if the requirement of (B) is met. Therefore, a permit condition should be added to Section VI to state the requirement of 61.349(a)(1)(ii)(B). } 212
2. Table IV, for S-194, S-195, S-197, and S-198 (p. 208 and p. 216), allows a temperature excursion for a period less than or equal to 15 minutes in any hour. See comments for Valero Asphalt. } 213

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Miscellaneous

1. Sources A-13 and A-26 are vapor recovery compressor flare gas recovery headers that control sources 9,133,188,189. For S-189, a source test is required to demonstrate collection/destruction efficiency of $\geq 70\%$. } 214
- a. Section VI, Condition 19466, Part 2b (p. 506): The basis for S-189 is listed as Rule 2-6-503. The basis should be changed to Rule 8-8-307.2. } 215
- b. The list of equipment under Condition 19466 should include S-189 since Part 2b refers to this emissions unit. } 216

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ABATEMENT DEVICES (Table IIB)

Applicable Requirements

We understand that Tesoro has recently installed a major compressor system at the flare header that will reduce VOC emissions by capturing refinery gasses that were once routinely flared. Because many of the flares are prohibited from routine flaring, and because the refinery must also minimize emissions to comply with 40 CFR 60 Subpart A for all units subject to the NSPS (for instance see Table IV - U, page 95 and Table IV - X, page 102), we recommend including the compressor system in Table II-B along with a condition requiring the use of the compressor. Not only would this condition help assure compliance with applicable requirements to capture non-emergency/malfunction releases, it would demonstrate to the public that Tesoro has made improvements to its refinery that will reduce emissions to the surrounding community.

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Monitoring

It is currently unclear what monitoring is required to ensure that the abatement devices in Table IIB meet their emission limits because the table in the proposed permit does not contain this information. For abatement devices subject to monitoring (e.g., the baghouse monitoring mentioned on page 34 of the engineering evaluation), all of the applicable requirements should be included in the table. In addition to making the monitoring requirements clearer, this revision will also make Tesoro's draft permit more consistent with the draft permits for the other refineries (see Table IIB in Chevron's draft permit).

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COMBUSTION UNITS

Applicable Requirements

Boilers #5 and #6/ coking (including existing SIP monitoring)

1. It appears that an existing firm limit of 775 mmbtu/hr for boiler #6 (S-904) has been increased to 848 mmbtu/hr on page 17 and in part 1 of Condition #16685. We appreciate the District's commitment to explaining the correct rating in the statement of basis and to imposing all applicable BACT/offset/NSPS requirements.
2. For sources 903 (boiler #5, 740 mmbtu/hr) and 904 (boiler #6, 775 or 848 mmbtu/hr), we appreciate the District's commitment to determining which applicable SIP requirements, including SOx limits and monitoring, apply to the units based on their ability to burn coker exhaust. In addition, we appreciate the District's commitment to adding 300 ppm SOx limits and compliance monitoring pursuant to SIP 9-1-304 for burning solid and liquid fuels.
3. The NSPS requirements on pages 879-880 are incorrectly listed as subsumed. We appreciate the District's commitment to removing a proposed permit shield for the NSPS that lists them as subsumed requirements.

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